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13 COREPHOTONICS, LTD.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 COREPHOTONICS, LTD.

17 Plaintiff,

18 vs.

19 APPLE INC.

20 Defendant.

Case No. 3:17-cv-06457-JD (Lead)
Case No. 5:18-cv-02555-JD

**PLAINTIFF COREPHOTONICS, LTD.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL:**

- (1) PORTIONS OF ITS OPPOSITION TO APPLE INC.'S MOTION TO AMEND ANSWER;
- (2) PORTIONS OF DECLARATION OF BRIAN D. LEDAHL IN SUPPORT OF ITS OPPOSITION TO APPLE INC.'S MOTION TO AMEND ANSWER; and
- (3) ENTIRETY OF EXHIBIT 1 TO DECLARATION OF BRIAN D. LEDAHL IN SUPPORT OF ITS OPPOSITION TO APPLE INC.'S MOTION TO AMEND ANSWER

1 In accordance with Civil L.R. 7-11 and 79-5, Plaintiff Corephotonics, Ltd.
2 (“Corephotonics”) respectfully seeks a narrowly-tailored Order authorizing the sealing of portions
3 of its concurrently filed Opposition to Apple, Inc.’s Motion to Amend Answer and supporting
4 papers, namely:

- 5 1. Highlighted portions of Corephotonics’ Opposition to Apple Inc.’s Motion to
6 Amend Answer;
- 7 2. Highlighted portions of Declaration of Brian D. Ledahl in Support of
8 Corephotonics’ Opposition to Apple Inc.’s Motion to Amend Answer; and
- 9 3. Entirety of Exhibit 1 to Declaration of Brian D. Ledahl in Support of
10 Corephotonics’ Opposition to Apple Inc.’s Motion to Amend Answer.

11 As set forth in the accompanying Declaration of James S. Tsuei, the highlighted material
12 in Items 1-3 includes confidential information relating to Corephotonics’ patent licensing activity.
13 Compelling reasons and good cause exist to permit Corephotonics to file that information under
14 seal, as the public disclosure of that information would pose irreparable harm not only to
15 Corephotonics but also potentially to third parties involved in Corephotonics’ licensing activity.

16 Corephotonics has reviewed and complied with the Court’s Standing Order Governing
17 Administrative Motions to File Materials Under Seal and Civil Local Rule 79-5.

18 For the reasons set forth above, Corephotonics respectfully requests that the Court grant an
19 Order allowing Corephotonics to file the highlighted portions of the above documents under seal.

20 DATED: November 20, 2023

Respectfully submitted,

21 RUSS AUGUST & KABAT
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By: /s/ Marc A. Fenster
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Corephotonics, Ltd.

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CERTIFICATE OF SERVICE

I certify that counsel of record who are deemed to have consented to electronic service are being served on November 20, 2023, with a copy of this document via the Court's CM/ECF systems per Local Rule CV-5(a)(3). Any other counsel will be served by electronic mail, facsimile, overnight delivery and/or First Class Mail on this date.

/s/Marc Fenster

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